

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA )

INFORMATION

CR 15-25 DWF

Plaintiff, )

18 U.S.C. § 641

v. )

KHADRA ABDISAFAD HIRSI, )

Defendant. )

THE UNITED STATES ATTORNEY CHARGES THAT:

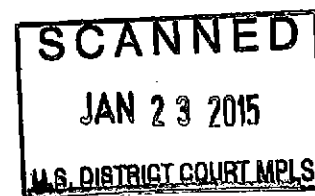
**COUNT 1**

(Theft of Public Money)

In or about February and March 2013, in the State and District of Minnesota, the defendant,

**KHADRA ABDISAFAD HIRSI,**

willfully and knowingly did steal, purloin, and convert to her use and the use of another money and property of the United States, having a combined value in excess of \$1,000, that is, child care subsidies administered by Minnesota counties and the Minnesota Department of Human Services (DHS) through the Child Care Assistance Program and funded by the United States Department of Health and Human Services and the State of Minnesota; in that the defendant willfully and knowingly submitted materially false Child Care Assistance Billing Forms and provided materially false claims to Minnesota counties and the DHS with regard to daycare services purportedly provided to children,



U.S. v. Khadra Abdisafad Hirsi

and thereby received payments for child care that she did not provide, all in violation of Title 18, United States Code, Section 641.

**FORFEITURE ALLEGATIONS**

If convicted of Count 1, alleging theft of public money in violation of Title 18, United States Code, Section 641, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count 1.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: *January 23, 2015*

ANDREW M. LUGER  
United States Attorney



BY: JOHN KOKKINEN  
Assistant U.S. Attorney  
Attorney ID No. 388356